

Exhibit 4

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 -----
5 Civil Action No.
6 In re: FLINT WATER CASES 5:16-cv-10444

7
8 HON. JUDITH E. LEVY
9 MAG. MONA K. MAJZOUB
10 -----

11
12 STATE OF MICHIGAN
13 IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE
14 -----
15 IN RE FLINT WATER Case No. 17-108646-NO
16 LITIGATION Hon. Richard B. Yuille

17
18 JENNIFER MASON, et al. Case No. 16-106150-NM
19 Hon. Richard B. Yuille

20 Plaintiffs,

21 V.

22 LOCKWOOD, ANDREWS & NEWNAM,
23 PC, et al.,

24 Defendants. HIGHLY CONFIDENTIAL

-----X VOLUME I
VIDEOTAPED DEPOSITION OF DAVID GADIS
Thursday, January 30, 2020, 9:07 a.m.

Washington, DC 20005
Reported by: Denise Dobner Vickery, RMR, CRR

23 GOLKOW LITIGATION SERVICES
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Thursday, January 30, 2020

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9:07 a.m.

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10 Videotaped Deposition of DAVID GADIS,
11 held at the offices of:

12

13 COHEN MILSTEIN SELLERS & TOLL PLLC

14

1100 New York Avenue NW

15

Suite 500, West Tower

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Washington, DC 20005

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18

19 Pursuant to notice, before Denise Dobner
20 Vickery, Certified Realtime Reporter, Registered
21 Merit Reporter, and Notary Public in and for the
22 District of Columbia.

23

24

1 APPEARANCES:

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3 ON BEHALF OF EXECUTIVE COMMITTEE FOR CLASS
4 PLAINTIFFS:

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37 ALSO PRESENT:

38 FRANCIS X. FERRARA,
39 Senior VP & Deputy General Counsel
40 Veolia North America

41 VIDEOGRAPHER: Daniel Holmstock

1 not necessarily always the -- the facts in selling
2 in selling -- in selling your brand.

3 Q. I understand that, sir.

4 Would you agree that as someone in
5 charge of business development, though, a central
6 component of that is making money for the company;
7 correct?

8 A. Depends on what the goals are for
9 that year.

10 Q. Can you identify a single year after
11 you took over business development in which the
12 goals were not related to making money for Veolia?

13 MR. BROWN: Objection. Misstates
14 his testimony.

15 MS. LEVENS: Can you name a year?
16 I'm not quoting his testimony.

17 THE WITNESS: I don't know about a
18 year, but there are different projects that
19 don't necessarily mean that you make money.

20 BY MS. LEVENS:

21 Q. And what would those goals have been
22 that didn't involve making money for Veolia?

23 A. Sometimes to do the right thing for
24 a community and to help people.

1 Q. So it's your testimony that
2 sometimes Veolia would have the goal of doing the
3 right thing for the community to help people; is
4 that right?

5 A. And for the industry.

6 Q. And for the industry.

7 What are you referring to by "the
8 industry"?

9 A. The water industry, the water and
10 wastewater industry.

11 Q. Okay.

12 A. The environment, those sort of
13 things.

14 Q. And can you give any examples of
15 times when Veolia had the goal of doing the right
16 thing for the community to help the people?

17 A. Yeah, Flint.

18 Q. Flint.

19 So Flint was not about making money
20 for Veolia; is that right?

21 A. It's a \$40,000 project, ma'am.

22 Q. You would have considered that a
23 small project for Veolia; right?

24 A. I don't know about a small project,

1 but there wasn't -- there was not enough revenue
2 there and the man-hours that needed in order for
3 you to say that this was going to be a money
4 project. It's \$40,000.

5 Q. Did Veolia -- during the time that
6 you were in charge of business development, did
7 Veolia regularly take on projects that were only
8 \$40,000?

9 A. No.

10 Q. So based on the projects that you
11 oversaw during your time in business development,
12 the Flint project would have been a small project;
13 right?

14 A. I don't know about small, but it
15 would have been a project that we would have
16 looked at carefully to make sure that it was the
17 right project for the organization and for that
18 community and can we help them.

19 Q. Okay. So it's your testimony today
20 that Veolia agreed to take the Flint project in
21 order to help the people of Flint?

22 A. Without a doubt.

23 Q. Okay. No other reason?

24 A. I can't speak for other people.